

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

WECARE RG, INC., GRACIE BAKED LLC, and
ANDREA SCHOENBEIN d/b/a SECOND CHANCE
TREASURES on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GIFTLY INC.,

Defendant.

CIVIL ACTION

Case No. 2:22-cv-02672

**DECLARATION OF
RAPHAEL JANOVE IN
SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR
FINAL APPROVAL OF
CLASS SETTLEMENT**

I, Raphael Janove, hereby declare as follows:

1. I am an attorney with Pollock Cohen LLP and counsel of record for Plaintiffs in the above-captioned action. I make this declaration in support of Plaintiffs' Motion for Approval of Class Action Settlement.

2. I have personal knowledge of the matters set forth herein and am competent to testify upon them if called upon to do so.

3. Attached as Exhibit 1 is a true and correct copy of the April 24, 2023, First Amended Settlement Agreement.

4. Attached as Exhibit 2 is a true and correct copy of the Transcript of the Hearing on Preliminary Approval for Class Settlement, held on April 19, 2023.

5. Attached as Exhibit 3 is a proposed Final Approval Order.

6. Since the Court granted preliminary approval and authorized notice to the Settlement Class Members on April 28, 2023, Facebook advertisements for the settlement have achieved 3,563,720 impressions and reached at least 668,163 unique individuals, and Google

advertisements have achieved 355,440 impressions and have been clicked 15,241 times. In addition, Giftly has sent direct notice of the settlement to 1,914 class members.

7. As of October 10, Class Counsel has reported that potential members of the Settlement Class have submitted 3,520 claims, mostly through the Giftly Settlement Webpage.

8. After an extensive notice program, only one exclusion request has been submitted, and no objections have been submitted.

9. The following table breaks down Class Counsel's hours spent by individual, their position, and their hourly rate, with tasks assigned to the below-described categories, from this case's inception through October 6, 2023. Individuals who worked under multiple titles and/or billable rates during the duration of this case are listed twice:

	Role	Rate	Category 1	Category 2	Category 3	Category 4	Category 5	Category 6	Category 7	Total Hours	Total Fees
Borochoff-Porte	Associate	\$575		1.3	3.3	0.5	5.2		2.5	12.8	\$7,360.00
Janove	Partner	\$750			6.9		1.0	5.1		13.0	\$9,750.00
Janove	Associate	\$650	6.4	9.3	26.5	4.7	30.2		4.3	81.4	\$55,640.00
Krebs	Associate	\$400	0.3		121.8	5.6	6.4	67.7	22.4	224.2	\$89,680.00
Rodriguez	Associate	\$575		0.3					1.2	1.5	\$862.50
Pollock	Partner	\$800	0.7	1.2	1.9	2.1	0.9	1	0.3	8.1	\$6,480.00
Staff		\$200			6.9		5.8	17.4	0.8	30.9	\$6,180.00
Junior Staff		\$150	10.4		9.3				2.6	22.3	\$3,345.00
Total Hours			17.8	12.1	176.6	12.9	49.5	91.2	34.1	394.2	
Total Fees			\$6,400.00	\$7,975.00	\$78,242.50	\$7,722.50	\$29,090.00	\$35,185.00	\$14,682.50		\$179,297.50

Category 1: Investigations and Factual Research
Category 2: Discovery
Category 3: Pleadings, Briefs, and Pretrial Motions
Category 4: Court Appearances and Preparation
Category 5: Settlement
Category 6: Settlement Administration
Category 7: Litigation Strategy, Analysis, and Case Management

10. The multiplier of the Class Counsel Fees (\$100,000) in relation to Class Counsel's total lodestar (\$179,297.50) is 0.56.

11. In making these calculations, Class Counsel excluded some \$10,837.50 of lodestar for administrative work in its assessment that was redundant or did not directly benefit the Settlement Class.

Executed on October 10, 2023.

/s/ Raphael Janove

Raphael Janove